

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

NEW DRAGON TOY WHOLESALE, INC.,

Chapter 11
Case No. 24-10653-mg

Debtor.

Hon. Martin Glenn

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**ORDER TO SHOW CAUSE AND TEMPORARY
RESTRAINING ORDER**

UPON the reading and filing of the annexed Declaration by Bo Shi, Esq.,
counsel for the Debtor New Dragon Toy Wholesale, Inc. (the “Applicant”), dated April
17, 2024, the annexed Declaration by Khim Bun Mak sworn to on April 17, 2024, the
exhibits annexed thereto, and upon all the papers and proceedings herein:

LET the Debtor or its attorney show cause before the Honorable Martin Glenn at
the United States Bankruptcy Court, One Bowling Green, Courtroom 523, New York,
NY 10004, on the _____ day of _____, 2024 at _____ A.M./P.M., or as soon
thereafter as counsel can be heard, why an order should not be made: Granting a
preliminary injunction with a temporary restraining order and;

- a) Pursuant to 11 U.S.C. §362(a), 11 U.S.C. §105 and RPAPL§ 749(3), preliminarily
enjoining and restraining Nomad West 27th Street LLC (the “Landlord”), and its
agents, attorneys, city marshals, employees, etc. from executing the eviction to the
premises located at 101 West 27th Street, 1st Floor, New York, New York 10001
(the “Premises”); and

b) Sanctions Landlord for its violation of automatic stay pursuant to 11 U.S.C.

§362(k); and

c) Granting Debtor such other, further and different relief as this Court may deem just and proper.

ORDERED that pending the hearing of this motion, good cause having been alleged, all interference of the Premises by the Landlord and its agents, attorneys, city marshals, employees are stayed, directly or indirectly; and it is further;

ORDERED that answering papers, if any, shall be served upon Shi & Associates, at 401 Broadway, Suite 409, New York, New York 10013, by no later than 5:00 P.M. on or before _____, 2024.

Respectfully submitted,

Dated: April 17, 2024
New York New York

Shi & Associates

By: s/Bo Shi
Bo Shi, Esq.
401 Broadway, Suite 409
New York, New York 10013
Tel: (212) 965-8686
Counsels for Debtor